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## IN THE UNITED STATES DISTRICT COURT FOR THE SOUTHERN DISTRICT OF NEW YORK

NANCY MARTIGNAGO, AMY FERGUSON, CINDY SELLERS, CATERINA DERKASCH,	) ) )
JUNE PARMAN-FLAX and ROBIN	) Case No. 11-cv-03923-PGG
GRANDUSKY, on behalf of themselves and all	)
others similarly situated,	) Judge Paul G. Gardephe
	)
Plaintiffs,	)
	)
V.	)
	)
MERRILL LYNCH & CO., INC., MERRILL	)
LYNCH, PIERCE, FENNER & SMITH	)
INCORPORATED, BANK OF AMERICA	)
CORPORATION,	)
	ý )
Defendants.	,

## PLAINTIFFS' MOTION FOR APPROVAL OF ATTORNEYS' FEES AND REIMBURSEMENT OF EXPENSES

For the reasons set forth in the Memorandum of Law in Support of Class

Counsel's Request for Award of Fees and Expenses, and in the Declarations of

Douglas M. Werman and Jennifer Schoen Gilbert in Support of Class Counsel's

Request for Award of Fees and Expenses, Plaintiffs respectfully request that the Court

enter an Order:

- (1) awarding Class Counsel attorneys' fees of 25% of the Settlement Fund (\$3,000,000); and
- (2) granting such other, further, or different relief as the Court deems just and proper.

Dated: September 26, 2013 Respectfully submitted,

By: s/ Jennifer Schoen Gilbert

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